

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA**

MARTIN J. WALSH,
SECRETARY OF LABOR,
U.S. DEPARTMENT OF LABOR,

Plaintiffs,

v.

PACKERS SANITATION SERVICES,
INC., LTD.,

Defendant.

CIVIL ACTION NO. 4:22-CV-3246

DECLARATION OF CELINA QUIJANO

I, Celina Quijano, hereby declare that the statements made in this Declaration, pursuant to 28 U.S.C. § 1746, are true and correct to the best of my knowledge and belief. I understand that false statements made herein are subject to the penalties of perjury and state as follows:

1. I am currently employed in the position of Office Coordinator with Packers Sanitation Services, Inc. Ltd. ("PSSI" or "Company") at the storefront office located at 1016 Oxford Street in Worthington, Minnesota.

2. I am over 18 years of age, I am a resident of the State of Minnesota, and I am competent to testify to the matters stated in this declaration, and if called and sworn as a witness, I could and would testify competently and truthfully to the matters stated in it.

3. I have not been promised any benefit, or been coerced or threatened in any manner in exchange for the testimony in this declaration. I have been specifically informed that I am free to provide or decline to provide any information relating to the paragraphs below.

4. I make this declaration voluntarily and of my own free will.

5. I have worked in the role of Office Coordinator for PSSI since August 2022. I perform several administrative tasks in that capacity, including ordering supplies, taking inventory, facilitating payroll for employees, and making schedule changing to sync the plant time clock with employees working. I also assist applicants through the hiring process by scheduling interviews with supervisors and providing applicants with a Chrome identification number so they may complete their applications.

6. If applicants are given conditional offers of employment following their interviews, I give them new hire documentation to complete and I review their photo identification for the purpose of completing Section Two of their Form I-9.

7. In reviewing the employee's identification to complete Section Two of the Form I-9, I make a photocopy of the identification and electronically scan that documentation to PSSI's corporate office so that the Company may run the candidate through E-Verify. If they pass through the E-Verify system and are verified for hire, I receive electronic notice of their authorization for employment from the corporate office. Subsequently, I proceed with the hiring process and set up the employee for orientation and training at the plant location.

8. If they are not authorized for hire, I will receive a notice of Tentative Nonconfirmation ("TNC") from the corporate office. At that time, I provide the employee with a copy of the TNC letter and advise them not to go to the plant location. I also notify the employee of their ability to contest the TNC with the Social Security Administration and the timing for doing so. If the employee is able to correct the TNC, I proceed with the onboarding process by scheduling their orientation and training at the plant. If the employee is unable to correct the TNC or does not return to PSSI within the requisite time period to contest the TNC, the Company proceeds with an immediate termination of employment.

9. If I ever felt that there was an issue with an applicant's or employee's paperwork, or if I had a question about the E-Verify system or the onboarding process, I would feel comfortable raising those questions or concerns with several individuals at the management level at PSSI.

10. I am new to PSSI and have not yet met all the PSSI employees but I have no knowledge of any employee, who was later alleged to be under the age of 18 years old, disclosing they received a chemical burn or other injury at PSSI. I also have no knowledge of any employee disclosing they worked while underage at PSSI. I am aware of employees working at PSSI while obtaining credits necessary to meet high school graduation requirements, but in all cases those employees were over the age of 18 and were in possession of a work permit in accordance with applicable federal and state law.

11. Before signing this declaration, I was provided with a full opportunity to carefully review this Declaration and freely make any corrections and additions of any kind.

Dated: 11/28/22



Celina Quijano